

COMCAST
CUSTOMER SERVICE QUALITY & COMPLAINT
STANDARDS, MONITORING & REPORTING PLAN

This document establishes the method by which Comcast shall monitor and evaluate the quality of service provided to its customers and track complaints by customers in the State of Vermont. It shall be referred to throughout the document as “Service Quality Plan” or “SQP.”

Section I: Measurement and Reporting Protocol

- A. Performance areas and standards shall be measured as detailed in Section II.
- B. This plan covers service to all Comcast’s Vermont cable customers.
- C. Comcast shall begin performance monitoring in accordance with this SQP on the first day of the first calendar quarter following Board approval of its CPG.
- D. Performance results shall be aggregated monthly and quarterly, and shall be reported quarterly to the Department of Public Service (DPS) and the Public Service Board (the Board) in an electronic format to be agreed upon between Comcast and DPS within 15 days of the Board’s approval of the plan.
- E. Quarterly reports shall include both monthly and quarterly averages. Quarterly averages shall be derived from raw data, not by averaging monthly averages.
- F. Comcast shall report its quarterly results for all performance areas no later than thirty days after the completion of each quarter.
- G. Where quarterly performance falls more than ten percent below any standard, or where performance does not meet any standard for two consecutive quarters, the Company shall within 30 days of the end of the quarter in which this provision is triggered, submit a corrective action plan indicating how it will regain the failed standard.
- H. Performance shall be evaluated and reported to one decimal place for all performance areas. Actual performance shall be rounded up when the second decimal place is 5 or more. Comcast shall retain all of its reports that support the results for each of the performance areas for a period of not less than 24 months after the results are reported. Comcast shall provide these reports upon request to DPS and the Board.
- I. Comcast shall review with the DPS Division of Consumer Affairs & Public Information (CAPI) any change to Comcast’s measurement protocol or to the internal reporting methods that are used to obtain the data measured prior to Comcast’s implementation of such changes. Comcast shall have an affirmative duty to report missing data or other

events that could reasonably affect the quality of the data at the time the Company becomes aware of such events.

- J. With respect to conditions Comcast believes fall outside “normal operating conditions” warranting exemption from standards that apply only in the case of normal conditions, Comcast shall, detail any conditions in the quarterly service quality report that are believed to be “out of normal.” Quarterly reports shall include detailed information concerning the commencement and duration of the excluded period and the geographical areas affected. If DPS disputes the designation by the company of an out-of-normal condition, the Board shall be asked to rule on the matter.

K. Definitions:

1. Customer Complaint: A “customer complaint” is any situation in which a customer needs to be forwarded to a level higher than the customer service representative that initially speaks with the consumer. Should consumer complaints to the Department of Public Service concerning Comcast exceed an annual rate for the prior calendar year of 2.5 escalations¹ per thousand customers, Comcast must track and analyze all consumer complaints, including those that do not go beyond handling by a Customer Service Representative, consumer complaints in a manner that will enable their periodic analysis. Specifically, if this provision is triggered, the Company must work with the Department to develop a complaint-tracking protocol that defines what is considered a complaint to the Company and complaint categories to be tracked. The system should permit customer-service and sales representatives to capture written, telephonic, e-mail and face-to-face complaints and to allow easy tabulation and analysis of those complaints by system and topic. If this provision is triggered, on an annual basis, the Company must submit a report to the Department and the Board indicating the number and nature of complaints received, how they were analyzed by the Company, what systemic issues were identified, and what responses were implemented to address those systemic issues. Measurement of the consumer-complaint rate to determine whether this provision is triggered shall be calculated on a calendar year basis. If this provision is triggered, the requirements of this provision will continue for a period of the subsequent three years.
2. Business Day: A “business day” is any day, Monday through Friday, excluding days on which legal holidays are observed and Comcast is closed to routine business operations.
3. Normal Business Hours: “Normal business hours” are 8am through 7pm Monday through Friday excluding days on which legal holidays are observed and Comcast is closed to routine business operations.

¹ “Escalation” is a complaint to the Consumer Affairs & Public Information Division of DPS in which, following investigation, CAPI staff determines reasonably there is something the company could and should have done differently prior to the consumer having to contact DPS for assistance.

4. Reporting Month: A reporting month will encompass the first day through the last day of the applicable calendar month.
5. Normal Operating Conditions: “Normal operating conditions” shall be those service conditions that are within the control of Comcast. Those conditions, which are not within the control of Comcast, include, but are not limited to, natural disasters, civil disturbances, power outages, telephone network outages, and severe or unusual weather conditions. These conditions may occur in locations in other states that disrupt the normal flow of customer inquiries into Comcast.
6. Standard Installation: A standard installation shall be an installation of 300 feet or less, starting at the nearest end of the existing trunk or distribution system.

Section II: Service Quality Performance Areas and Standards

Comcast shall measure and report service quality in the following performance areas and in relation to the following standards:

- A. Calls Answered Thirty Seconds: At least 90 percent of all calls during normal business hours shall be answered within 30 seconds under normal operating conditions. Measurement begins when the call is placed in queue to reach a customer service representative (CSR) and is terminated when either the call is answered by a CSR or when the customer abandons the call. Comcast will program no more than 50 seconds of messaging and prompting in its call vectors except the repair vectors, which may be used to provide automated outage information, and therefore may exceed the 50 second limit. Except for the repair vector, Comcast will not exceed the 50 second limit without providing DPS with at least 30 days prior opportunity to object. Upon DPS objection to a request for a change in the standard, Comcast may not exceed the 50 second limit without first obtaining Board approval.
- B. Abandoned calls: Under normal operating conditions, average monthly calls abandoned shall not exceed four percent of total calls reaching Comcast, excluding calls abandoned before 30 seconds has elapsed.
- C. Calls transferred in 30 seconds: At least 90 percent of all calls during normal business hours that need to be transferred, shall be transferred within 30 seconds under normal operating conditions.
- D. Customers Receiving Busy Signal: Under normal operating conditions, the customer shall receive a busy signal less than three percent of the time.
- E. Installations Performed On Time: Under normal operating conditions, at least 95 percent of standard installations shall be performed within seven business days after the order has been placed, excluding all orders that were requested by the customer to be completed

outside the seven day window. The installations that are exempt from reporting are the following:

- Jobs greater than 300 feet in length of installation drop.
- Customer requested jobs that are scheduled for greater than seven business days at the customer request when appointments were available to that customer that would have been within compliance (i.e. within seven business days).
- Cancelled installation jobs due to customer request.
- Rescheduled or not done installation jobs that are coded to one of the following reasons: Customer requested; No access; No Authorization; No schedule; Customer will call; Customer not home; Only minor home; No money.

- F. Repair of Service Interruptions: Excluding conditions beyond Comcast's control, at least 95 percent of the time, work on service interruptions (nil or no picture trouble calls) shall begin promptly and in no event later than 24 hours after the interruption becomes known, excluding all orders that were requested by the customer to be completed outside the 24-hour window.
- G. Repair of Non-Nil Troubles: Under normal operating conditions, at least 95 percent of the time work on non-nil service calls shall begin no later than the next business day after notification of the service problem, excluding all orders that were requested by the customer to be completed outside the 24-hour window.
- H. Four-hour appointment window: At least 95 percent of the time under normal operating conditions, Comcast shall offer a four-hour "appointment window" during normal business hours.
- I. Comcast Canceled Appointments: Under normal operating conditions, 95 percent of customers shall be contacted by the close of the prior business day in the event of an appointment cancellation.
- J. Advance Notice of Late Appointment: At least 95 percent of the time under normal operating conditions, the customer shall be contacted in advance if a company representative is running late for an appointment and shall be unable to keep the appointment as scheduled. These customers shall have the opportunity to reschedule at a time convenient for them.
- K. Billing complaints: In all cases of billing complaints Comcast shall acknowledge all such complaints not later than three business days after receipt.
- L. Response to billing complaints: In all cases of a billing dispute, Comcast shall provide a written proposal for disposition of the complaint no later than 15 days after receipt.
- M. Response to contested resolutions: In all cases of billing complaints in which the consumer contests the proposed disposition offered by Comcast, the company shall provide a final disposition within 15 business days of the date on which the consumer contested the company's response. Comcast shall log the incidents that occur when a

customer contests Comcast proposed settlement of an issue, and will also log the eventual resolution of that issue.

- N. All refunds shall be issued no later than either: (a) the customer's next billing cycle following resolution of the request or 30 days, whichever is earlier; or (b) the return of the equipment supplied by Comcast if service is terminated.
- O. Timely issuance of credits: All credits for service shall be issued no later than the customer's next billing cycle following the determination that a credit is warranted.
- P. Outage credits: Credits shall be given for all outages known to Comcast that are more than 24 hours in duration. Credits for qualifying outages shall be provided upon customer request unless the outage is system-wide or the subscriber's disruption is otherwise known to the cable company, in which case Comcast shall provide credit without customer request.
- Q. Complaints to be filed: All consumer complaints to Comcast will be: captured, tabulated and analyzed, including corrective actions taken in response to the complaints, and shall be provided to the Department in compliance with Title 30 § 514.